

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL SHAPIRO,

Defendant.

Case: 2:24-cr-20099  
Assigned To : Grey, Jonathan J.C.  
Referral Judge: Altman, Kimberly G.  
Assign. Date : 2/28/2024 3:25 PM  
Description: INDI USA V. SEALED (DA)

VIOLATION: 18 U.S.C. § 875(c)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

18 U.S.C. § 875(c)

*Transmitting Threats in Interstate Commerce*

On or about December 8, 2023, in the Eastern District of Michigan and elsewhere, the defendant, MICHAEL SHAPIRO, knowingly transmitted in interstate commerce a communication containing a threat to injure the person of another, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, and in conscious disregard of a substantial risk that the communication would be understood as a true threat. Specifically, MICHAEL SHAPIRO, while located in the State of Florida, placed a call from his cellular phone to the office of the Council on American-Islamic Relations (“CAIR”) Michigan Chapter located in the State of Michigan, and left a

voicemail in which he stated, “I’m going to kill you bastards. I’m going to kill you bastards,” in violation of Title 18, United States Code, Section 875(c).

**COUNT TWO**

18 U.S.C. § 875(c)

*Transmitting Threats in Interstate Commerce*

On or about December 14, 2023, in the Eastern District of Michigan and elsewhere, the defendant, MICHAEL SHAPIRO, knowingly transmitted in interstate commerce a communication containing a threat to injure the person of another, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, and in conscious disregard of a substantial risk that the communication would be understood as a true threat. Specifically, MICHAEL SHAPIRO, while located in the State of Florida, placed a call from his cellular phone to the office of the Council on American-Islamic Relations (“CAIR”) Michigan Chapter located in the State of Michigan, and left a voicemail in which he stated, “I’m going to kill you mother fucking bastards. Muslims! I’m going to kill you mother fuckers. I’m going to kill you! I’m going to kill you! I’m going to kill you!” in violation of Title 18, United States Code, Section 875(c).

**COUNT THREE**

18 U.S.C. § 875(c)

*Transmitting Threats in Interstate Commerce*

On or about December 15, 2023, in the Eastern District of Michigan and elsewhere, the defendant, MICHAEL SHAPIRO, knowingly transmitted in interstate commerce a communication containing a threat to injure the person of another, for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, and in conscious disregard of a substantial risk that the communication would be understood as a true threat. Specifically, MICHAEL SHAPIRO, while located in the State of Florida, placed a call from his cellular phone to the office of the Council on American-Islamic Relations (“CAIR”) Michigan Chapter located in the State of Michigan, and left a voicemail in which he stated, “You’re a violent people. Why do you come to America? Why do you come to Europe? Mother fuckers. You’re violent. You’re killers. You’re rapists. I’m going to kill you mother fuckers!,” in violation of Title 18, United States Code, Section 875(c).

**Special Finding—Hate Crime Motivation**

The Grand Jury further alleges that defendant MICHAEL SHAPIRO intentionally selected the victim of his threat in Counts One, Two, and Three because of the actual and perceived religion and national origin of the people who work at and are assisted by the Council on American-Islamic Relations (“CAIR”) Michigan Chapter, in violation of 18 U.S.C. § 875(c); U.S.S.G. § 3A1.1.

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

s/ John K. Neal  
JOHN K. NEAL  
Chief, Public Corruption and Civil Rights Unit  
Assistant U.S. Attorney

s/ France Lee Carlson  
FRANCES LEE CARLSON  
Assistant U.S. Attorney

Dated: February 28, 2024

United States District Court  
Eastern District of Michigan

**Criminal Case Cover Sheet**

Case: 2:24-cr-20099

Assigned To : Grey, Jonathan J.C.

Referral Judge: Altman, Kimberly G.

Assign. Date : 2/28/2024 3:25 PM

Description: INDI USA V. SEALED (DA)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it.

|  |                             |
|--|-----------------------------|
| <b>Companion Case Information</b>  | Companion Case Number:      |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> : | Judge Assigned:             |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      | AUSA's Initials: <i>FLC</i> |

Case Title: USA v. Michael Shapiro

County where offense occurred : Wayne County

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.

☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

☐ Corrects errors; no additional charges or defendants.

☐ Involves, for plea purposes, different charges or adds counts.

☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

February 28, 2024

Date



Frances Lee Carlson

Assistant United States Attorney

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Attorney Bar #: P62624

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.